[redacted]

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1951

No. 625

COLLEGE HOMES, INC.,

Petitioner,

vs.

UNITED STATES OF AMERICA

PETITION FOR REHEARING FOR PETITION FOR WRIT OF CERTIORARI

Petition for Rehearing for Petition for Writ of Certiorari to the United States Court of Appeals for the Tenth Circuit.

To the Honorable Chief Justice and Associate Justices of the Supreme Court of the United States:

College Homes, Inc., respectfully petitions the Honorable Court for a rehearing after denial of Petition for Writ of Certiorari on the grounds that it was physically impossible to prepare and file a Reply Brief to the Brief in Opposition between the time of its receipt by us (April 28, 1952) and the denial (May 5, 1952), and also, that the information contained in the Reply Brief of Petitioner if considered by this Court would compel a different result and that the delay in

presenting and filing the Reply Brief of Petitioner was not occasioned by default or neglect of the Petitioner.

Statement

The Brief in Opposition was received by Petitioner on April 28, 1952, the Petition for Writ of Certiorari was denied May 5, 1952, exactly 7 days later. The Reply Brief of Petitioner was mailed Registered, Airmail, Special Delivery, May 6, 1952 and received by the Clerk of the Supreme Court May 8, 1952. A purported copy of a collect telegram dated May 5, 1952 was received by Petitioner by airmail May 8, 1952 and the Reply Brief of Petitioner was returned to Petitioner Monday, May 12, 1952 and Wednesday May 14, 1952; that the material and information contained in the Reply Brief of Petitioner discloses substantial grounds for granting the Petition for Writ of Certiorari herein which were not previously presented to this Court, and which grounds became pertinent only upon the presentation and filing of the Brief in Opposition to the Government of the United States of America.

Argument

Inasmuch as this information was not considered prior to denial of Petition for Writ of Certiorari the statement and argument contained in the Reply Brief of Petitioner, which is attached hereto, made a part hereof as though fully set forth therein, and particularly the conclusion referred to therein demonstrate the importance of a review by this Honorable Court of the record of the Tenth Circuit Court of Appeals.

Conclusion

It is important that the highest court of our land carefully review the opinion of the Tenth Circuit Court entered as an Order reference to this case December 3, 1951 to redetermine

the question of whether or not to put its stamp of approval upon an inherently dishonest transaction cleverly engineered and executed through a Federal Agency (Federal Housing Administration) of the United States Government in conspiracy to defraud the United States Government and innocent persons out of several hundred thousands of dollars and with a continuing conspiracy to in turn endeavor to completely "whitewash" and cover up by means of a legal and technical procedure labeled *"foreclosure"*.

This case offers an opportunity to apply the conception of justice as set forth in the opening words of the *Institutes of Justinian,* the key to that vast edifice of Roman Law which embodied the experience of the ancient world. This classical definition of *justice,* a legal rendering of the Golden Rule, and covering economic as well as political rights, is:

> *"Justice is the constant and enduring will to give to every man his right."*

It is respectfully submitted that this petition should be granted.

COLLEGE HOMES, INC.

By ALDEN CHAS. PALMER,
President,
3255 Palmer Drive,
Los Angeles 65, California.

I, Alden Chas. Palmer, do hereby certify that the petition for rehearing herein is presented in good faith, not for delay, and is restricted to the grounds stated therein, and that such grounds are confined to intervening circumstances of substantial and controlling effect and to other substantial grounds available to Petitioner, not previously presented, but included in the record.

ALDEN CHAS. PALMER,
President of College Homes, Inc.